

**BEFORE THE APPELLATE AUTHORITY**  
**(Under the Right to Information Act, 2005)**  
**SECURITIES AND EXCHANGE BOARD OF INDIA**

**Appeal No. 5983 of 2024**

|                    |    |            |
|--------------------|----|------------|
| Shashank Dubey     | :  | Appellant  |
|                    | Vs |            |
| CPIO, SEBI, Mumbai | :  | Respondent |

**ORDER**

1. The appellant had filed an application (Reg. No. SEBIH/R/P/24/00039) dated February 16, 2024 (received by SEBI on February 23, 2024) under the Right to Information Act, 2005 (“**RTI Act**”). The respondent, by a letter dated March 21, 2024, responded to the application filed by the appellant. The appellant filed an appeal dated March 28, 2024 (received by the Office of Appellate Authority on April 08, 2024). I have perused the application, the response of the respondent and the appeal and find that the matter can be decided based on the material available on record.
2. **Ground of appeal-** On perusal of the appeal, it appears that the appellant is not satisfied with the response provided by the respondent.
3. Before delving into the merits of the case, I find it essential to highlight the manner in which the appellant has submitted his application. Instead of organising his requests into clear and distinct requests, the appellant has sought information in a disorderly fashion, grouping multiple requests under one overarching point/request. The lack of organisation makes it difficult to comprehend and respond effectively to each individual concern raised by the appellant. By submitting the RTI application in a more structured and focussed manner, the appellant could have enhanced the clarity and effectiveness of his application.
4. **Request Nos. 1, 2 and 3 of the application-** The appellant vide requests nos. 1 and 2 of the application, *inter alia*, sought certified copies of information regarding statutory proceedings initiated against certain group companies of Vedanta Ltd.

The respondent vide request no. 3 of the application sought certified copies of documents pertaining to resumption of trade by Sterlite Industries India Ltd. including copies of application submitted by the company in this regard, permission/approval/NOC granted by SEBI for the same, etc.

5. **Reply of the Respondent** – The respondent, in response to the aforesaid request, informed that for issuance of certified copies of orders issued by SEBI, the appellant may refer SEBI Circular No. CIR/LAD/1/2019 (Issue of Certified copies of Orders and Circulars) dated April 04, 2019 and SEBI Circular No. SEBI/HO/LAD1/LAD1\_DoP3/P/CIR/2023/88 (Amendment to Circular on issue of Certified copies of Orders and Circulars) dated June 13, 2023, available on the SEBI website. The respondent provided the path to access the said circulars on SEBI website.
6. I have perused the aforesaid requests and the response provided thereto. I find that the respondent has adequately addressed the requests by providing the information available with him. Hence, I do not find any deficiency in the response of the respondent.
7. As regards requests nos. 4 - 7 of the application, I am compelled to highlight the manner in which the information has been sought. I note that the appellant has under one point, merged numerous requests, leading to difficulty in identification and segregation of the requests. I find that appellant's consolidation of numerous requests into one point complicates the process of distinguishing and adequately addressing each individual requests. Further, I note that the appellant's request is muddled with numerous legal provisions, citation to case laws and other legal references, which makes it challenging to understand the precise information he is trying to seek. In view of the aforesaid observation, I find that the said requests of the appellant are vague/not specific. It is an established law that the information sought for in order to be disclosable under the RTI Act, must be clear, specific and available in the records of the public authority. In this context, I note that in the matter of *Mr. T. V. Sundaresan vs. CPIO, Securities and Exchange Board of India* (Decision dated November 24, 2021), the Hon'ble Central Information Commission (hereinafter referred to as "**CIC**") held: "*The framework of the RTI Act, 2005 expects that the information sought is specific and believed to be existing with the public authority in documented or material form as such; which can be shared with the appellant as per the provisions of the RTI Act. Answering to broad, multiple and general queries and presumptive documents that should have been generated as per the expectation of the appellant cannot be furnished under the provisions of the Act.*". Further, I also note that some of the requests are in the nature of seeking clarification and are interrogative queries. In my opinion, the CPIO is not supposed to provide clarification/opinion; or to interpret information; or to compile information as per the desire of the appellant under the ambit of the RTI Act. In this context, reliance is placed on the

matter of *Laxman Prasad Kayal vs. CPIO, State Bank of India* (Order dated June 20, 2023), wherein the Hon'ble CIC held that *"9. The Commission based on a perusal of the facts on record finds that the dissatisfaction of the Appellant with the reply provided by the CPIO is bereft of merit as the RTI Application merely seeks for clarifications and answers to interrogative queries. It appears that the Appellant is harbouring a grievance and is not seeking access to information as envisaged under the RTI Act."*

8. Further, reliance is placed on the matter of *Naresb Kadyan Vs. CPIO, Veterinary Council of India* (Decision dated June 14, 2023), whereby the Hon'ble Central Information Commission (hereinafter referred to as "CIC") observed that *"... Complainant shall note that the outstretching the interpretation of Section 2(f) of the RTI Act to include deductions and inferences to be drawn by the CPIO is unwarranted as it casts immense pressure on the CPIOs to ensure that they provide the correct deduction/inference to avoid being subject to penal provisions under the RTI Act"*. It can be seen from above that courts have considered the burden placed on public authorities when dealing with poorly filed RTI applications. If an RTI application is ambiguous, overly broad, or lacks specificity, it may consume valuable time and resources of the public authority in processing and responding to it. Notwithstanding the above, I note that the respondent has provided some information to the appellant which may be the probable request he could deduce and identify from the voluminous and dense details provided by the appellant in his application.
9. In view of the above observations, I find that there is no need to interfere with the decision of the respondent. The Appeal is accordingly dismissed.

Place: Mumbai  
Date: May 7, 2024

**B RAJENDRAN**  
**APPELLATE AUTHORITY UNDER THE RTI ACT**  
**SECURITIES AND EXCHANGE BOARD OF INDIA**